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February 15, 2008

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

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Office of Air Waste & Toxics

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Subject: **February 15, 2008, Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the February 15, 2008, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 15, 2008, to February 15, 2008.

#### Significant Developments This Period

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- During the week of January 28, 2008, final installation and equipment testing was completed on Remedial Action Pilot Study System (Pilot System). The Pilot System was operational on January 30, 2008.
- Groundwater elevation data from newly installed wells were collected before starting the Pilot System, and every two hours for the first several days of operation. Water levels are currently being collected weekly.

#### Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- The Pilot System will continue to be evaluated during the next reporting period, including weekly groundwater elevation data collection.
- Groundwater monitoring activities associated with Remedial Action Pilot Study Performance Monitoring Plan will be conducted during the week of February 25, 2008.

1700 El Camino Real, Suite 407 P.O. Box 5902 San Mateo, CA 94402  
Phone 650 349 0201 Fax 650 570 6878



USEPA RCRA



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*January 15, 2008, Progress Report*

**Other Information**

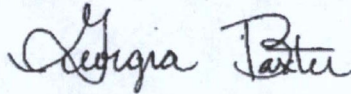
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

**Certification**

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

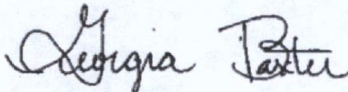
Signature:



Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: February 15, 2008

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201

Sincerely,



Georgia Baxter  
CEO

cc: Jeanne Tran, Ecology  
RueAnn Thomas, Bluefield Holdings  
Douglas Fox, Stella-Jones Corp.  
J. Stephen Barnett, Premier Environmental Services, Inc.